

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK
ALBANY DIVISION**

| | | |
|------------------------------------|---|-------------------------------|
| MICHAEL LIPFORD, individually & on |) | Case No. 1:15-cv-1174-BKS-DJS |
| behalf of all similarly situated, |) | |
| |) | |
| Plaintiff(s), |) | DANIEL J. STEWART |
| |) | U.S. MAGISTRATE JUDGE |
| v. |) | |
| |) | |
| ATLAS RAILROAD |) | |
| CONSTRUCTION, LLC, |) | |
| |) | |
| Defendant. |) | |

SETTLEMENT RELEASE FOR <<NAME>>

I understand that if I sign this Release and have it postmarked or returned to Bernard Mazaheri, whose contact information is provided below, by <<date of seventy-five (75) days from date of Final Order and Judgment>>, I will receive a payment of \$<<AMOUNT>>.

I wish to take part in the settlement. By signing and returning this form, I understand that I am releasing and discharging Atlas Railroad Construction, LLC ("Atlas"), and its parents companies, subsidiaries, affiliates, owners, stockholders, predecessors, successors, assigns, agents, directors, officers, employees, representatives, attorneys, insurers, divisions, benefit plans, plan fiduciaries, and/or administrators, and assigns, and all persons acting by, through, under or in concert with any of them, from any and all claims for unpaid minimum wages, overtime, improper deductions, and other wage-related claims under any federal, state, or local law, including, but not limited to, all claims asserted, or that could have been asserted arising from or relating to facts brought forth in this lawsuit. For the avoidance of doubt, this release does not include any other claims other than the wage-related claims described here.

I agree to keep my settlement amount confidential. I may not disclose the terms of the settlement, including the settlement amount, to anyone else, except to my attorney, spouse, tax preparer, or accountant, but only if I inform them that they must also keep the terms confidential. If I or my attorney, spouse, tax preparer, or accountant fails to maintain confidentiality of the terms of the settlement, then Atlas may seek remedies against me for my or my attorney's, spouse's, tax preparer's, or accountant's failure to maintain confidentiality in an appropriate court. I understand that I am responsible for all taxes due with respect to any settlement payment I receive, other than employer payroll taxes.

Signature

Date

Mail, Fax, or Email This Form To:

Bernard R. Mazaheri
Morgan, Morgan Law Firm
20 North Orange Avenue, Suite 1600
Orlando, Florida 32801
(407) 420-1414 (telephone); (407) 245-3487 (facsimile)
bmazaheri@forthepeople.com